

## DECLARATION OF TFO JEFFREY LADD

Pursuant to 28 U.S.C. § 1746 and the laws of the United States, I, Jeffrey Ladd, declare and state the following is true to the best of my knowledge:

### Probable Cause Affidavit

1. I, Jeff Ladd, am an "investigative or law enforcement officer" of the United States, within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrest for, offenses enumerated in Section 2516 of Title 18, United States Code. I am employed as a Detective with the Raleigh Police Department, Raleigh, NC. I am currently assigned to the Drug Enforcement Administration ("DEA") as a Task Force Officer ("TFO"). I am assigned to the Atlanta Field Division, Raleigh Resident Office and have been so assigned since June of 2021. Prior to my assignment with the DEA, I was assigned, as a detective with the Raleigh Police Department's Narcotics Unit for approximately nine years. I have been employed by the Raleigh Police Department as a Police Officer since March of 2004. In connection with my official DEA duties, I investigate criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, and 846. I have received special training in the enforcement of laws concerning substances as found in Title 21 of the United States Code. I have testified in judicial proceedings and in prosecutions for violations of controlled substance laws. I have also been involved in various types of surveillance, and in the debriefing of defendants, witnesses and informants. I have attended formal and informal training involving the conduct of illegal drug investigations and have had discussions with more senior Task Force Officers, Special Agents, Officers and others who have knowledge of the distribution and transportation of controlled substances, and of the laundering and concealing of proceeds from drug trafficking.
2. I am familiar with and have participated in all the normal methods of investigation, including, but not limited to, visual surveillance, the general questioning of witnesses, the use of informants, the use of pen registers and undercover operations and the use of communications and electronic monitoring as provided by law. The basis for the facts that I have contained within this affidavit are based in part upon my direct knowledge of the case and facts and evidence related to me by other law enforcement officers and civilians. In connection with my official DEA and Raleigh Police Detective duties, I investigate criminal violations of the federal drug laws and related statutes, including, but not limited to, violations of Title 21, United States Code, Sections 841, 843, 846, 848, 856, 952, 960, 963, and Title 18, United States Code, Section 371, 1952, 1956, 1957 and I have received specialized training in the enforcement of the drugs laws. I have also received specialized training in the investigation of drug trafficking and drug organizations, including training in drug recognition and terminology, undercover operations, interviewing techniques, financial/money laundering investigations, and the use of electronic surveillance.

**GOVERNMENT  
EXHIBIT**

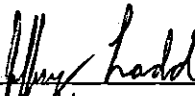
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3. This declaration is submitted in support of a verified complaint of forfeiture of \$391,952.00 in U.S. Currency seized on October 19, 2024, from Akram BERRO (BERRO).
4. This declaration contains information regarding the execution of a search warrant by the Raleigh Police Department on October 19, 2024, involving BERRO. I make this declaration based on evidence that there is sufficient probable cause to believe BERRO was involved with the unlawful possession with intent to distribute marijuana in the Eastern District of North Carolina and by doing such, he committed violations of federal drug laws set forth in Title 21, United States Code, Sections 846 and 841, which support the seizure and forfeiture of \$391,952.00 in U.S. Currency.
5. On October 18, 2024, at approximately 4:00 p.m., Raleigh Police Officer Brent Keaton responded to a 911 call regarding the odor of marijuana coming from a storage unit at Cardinal Self Storage located at 4200 Columbus Club Drive Raleigh, NC 27604. The 911 caller advised that the customer had just rented the storage unit the previous day and that the entire building now smelled like marijuana.
6. Once Officer Keaton arrived on scene he was directed by the manager to unit B-121. Officer Keaton immediately smelled the odor of marijuana when he entered the building. The odor of marijuana intensified as Officer Keaton approached the unit. Officer Keaton determined that the odor was most intense while standing in front of the unit with his nose to the cracks of the door.
7. The manager advised Officer Keaton that two males had come to the business on October 17, 2024, and asked to rent a storage unit. The manager stated that the two males appeared to be under the influence of marijuana and gave her an uneasy feeling. The manager stated that these individuals were the only new customers in the past few days and the building did not smell like marijuana prior to their arrival.
8. On October 19, 2024, Officer Keaton was granted a search warrant by a magistrate judge for unit B-121 located at 4200 Columbus Club Dr Raleigh, NC 27604. The search warrant was executed at approximately 0900 hrs. Once inside the storage unit, Officer Keaton located multiple plastic grocery bags with sticky notes identifying different types of marijuana and multiple boxes containing sealed clear plastic bags containing marijuana in one-gram increments. Three black safes were located inside the storage unit that contained \$391,952.00 in United States Currency. In addition to the marijuana and bulk United States currency, documents were also located in the storage unit belonging to BERRO. All evidence recovered was transported and placed into Raleigh Police evidence.
9. At approximately 5:00 p.m., Officer Eric Heib responded to a second 911 call at Cardinal Self Storage in regard to BERRO on scene claiming to be the one renting storage unit B-121. Officer

Heib spoke with BERRO who confirmed the storage unit belonged to him. BERRO stated that the marijuana inside the storage unit was a commercial hemp product that he buys in bulk from Garden Grove, California. BERRO stated that since he buys in bulk, he packages the product himself. BERRO stated that he heard from other smoke shop owners in Fayetteville and Raleigh that said they had been raided by law enforcement and large amounts of hemp and currency was seized. BERRO stated that he became nervous and decided to put the items inside a storage unit.

10. On January 8, 2025, TFO Jeff Ladd and TFO Brandon Johnson retrieved the marijuana that was seized during the search warrant on October 19, 2024, located at 4200 Columbus Club Dr Raleigh, NC 27604 from Raleigh Police Evidence. Evidence Item 3 and Item 4 associated with the seizure were transported to Delta 9 Analytical and released to Chief Operating Officer Frank Maurio for drug testing. Delta 9 Analytical tested four samples of the marijuana. All samples were above the legal THC threshold of .3 in North Carolina. The percent of the tested marijuana ranged from 22.4% to 11.61%.
11. On January 15, 2025, TFO Jeff Ladd and SA Katherine Orellano retrieved Raleigh Police Evidence Item 3 and Item 4 from Delta 9 Analytical. The evidence was transported back to Raleigh Police Evidence for safekeeping.
12. The total amount of United States currency seized in the search warrant was \$391,952. Based on the facts and circumstances related above, this Task Force Officer believes that probable cause exists that the \$391,952.00 seized from BERRO in Raleigh, NC was furnished or intended to be furnished in exchange for a controlled substance, or is proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act, and is, therefore, subject to forfeiture to the United States pursuant to Title 21, U.S.C. section 881(a)(6).

I declare under penalty of perjury that the aforementioned information, as provided to me, is true and correct. This, the 18 day of March, 2025

  
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Jeffrey Ladd  
Task Force Officer  
U.S. Drug Enforcement Administration